

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

MICHAEL B. KINGSLEY,
Plaintiff,

vs.

Civil Action No. 10-CV-832

LISA JOSVAI, PATRICIA FISH, ROBERT
CONROY, STAN HENDRICKSON, FRITZ
DEGNER AND KARL BLANTON,
Defendants.

PROTECTIVE ORDER

Based on the foregoing Stipulation of the parties, IT IS HEREBY ORDERED as follows:

1. The Defendants will produce a copy of the audio and video recordings depicting the incident which is the subject of this action to Plaintiff's counsel. These recordings shall be held in confidence by Plaintiff's counsel. The recordings must not be used or disclosed by the Plaintiff or Plaintiff's counsel for any purposes whatsoever other than preparing for and conducting the trial (including appeal) in this action. Plaintiff's counsel may review the recordings in the presence of the Plaintiff but shall not, under any circumstances, provide a copy of the recordings to Plaintiff. Finally, Plaintiff's counsel shall not reveal, produce, or disclose the recordings, or the contents thereof, to any other person or entity, except that disclosure may be made in the following circumstances:

- a. Disclosure may be made to employees of Plaintiff's counsel who have direct functional responsibility for the preparation and trial of the lawsuit. Any such employee to whom Plaintiff's counsel makes a disclosure must be advised of, and become subject to, the provisions of this Protective Order requiring that the recordings be held in confidence.
- b. Disclosure may be made to consultants, investigators, or experts (hereinafter referred to collectively as "experts") employed by Plaintiff's

counsel to assist in the preparation and trial of the lawsuit. Prior to disclosure to any expert, the expert must be informed of and agree to be subject to the provisions of this Protective Order requiring that the recordings be held in confidence.

2. Except as provided in paragraph 1, Plaintiff's counsel shall keep the recordings received under this Protective Order secure within their exclusive possession and must place the recordings in a secure area.

3. In the event Plaintiff's counsel wishes to introduce the recordings into evidence prior to trial, Plaintiff's counsel shall do so under seal.

4. At the conclusion of the litigation, Plaintiff's counsel's copies of the recordings shall be returned to Defendants' counsel for destruction.

Dated at Madison, Wisconsin, this 28th day of March, 2012.

BY THE COURT

Barbara C. Crabb

The Honorable Barbara C. Crabb
U.S. District Judge